

WC:JSR

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-11-241

- - - - - X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(T. 18, U.S.C. §
1542)

FNU LNU,
also known as
"Marisol Serrano Ruiz"

Defendant.

- - - - - X

EASTERN DISTRICT OF NEW YORK, SS:

ANTHONY MOJICA, being duly sworn, deposes and says that he is a Special Agent with the United States Diplomatic Security Service ("DSS"), duly appointed according to law and acting as such.

Upon information and belief, on or about March 3, 2011, within the Eastern District of New York, the defendant, FNU LNU, also known as "Marisol Serrano Ruiz," did knowingly and willfully use and attempt to use a passport the issue of which was secured in any way by reason of any false statement.

(Title 18, United States Code, Section 1542)

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.

The source of your deponent's information and the grounds for his belief are as follows:¹

1. My information comes from a joint investigation of the DSS and the United States Customs and Border Protection agency ("CBP"). I have spoken with CBP agents, interviewed the defendant and reviewed documents.

2. On March 3, 2011, at approximately 8:00 a.m., the defendant FNU LNU, also known as "Marisol Serrano Ruiz," arrived at John F. Kennedy International Airport on JetBlue Flight No. 834 from Santiago, Dominican Republic.

3. The defendant, FNU LNU, also known as "Marisol Serrano Ruiz," presented United States passport 097669770, in the name of "Marisol Serrano Ruiz," date of birth May 28, 1960, to a United States Customs and Border Protection ("CBP") officer. A CBP officer ran the defendant's passport number and determined that it was "flagged."

4. The defendant, FNU LNU, also known as "Marisol Serrano Ruiz," was referred for a secondary inspection by CBP officers. During secondary inspection, the defendant was unable to answer several questions about Puerto Rican geography even though she claimed to have lived there for approximately 34 years.

5. During secondary inspection, defendant was shown a passport photograph of the individual listed as the

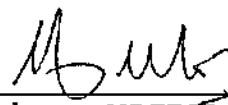
"stepsister" of the applicant for passport no. 097669770 in the application documents used to obtain the passport. The defendant was unable to identify the individual in the photograph.

6. Previously in 2008, after an investigation, DSS determined that the United States passport, no. 097669770, presented by the defendant was fraudulently obtained and issued to an imposter.

7. During the 2008 investigations, Special Agents of DSS interviewed an individual named "Marisol Serrano Ruiz," with a date of birth of May 28, 1960, and determined that "Marisol Serrano Ruiz" was in fact the interviewee's true identity. The DOS issued a United States passport, no. 408465043, to this individual.

8. Special Agents of DSS compared the photograph contained within United States passport, no. 408465043, with the defendant present in secondary inspection and were able to confirm that it was not the same individual.

WHEREFORE, your deponent respectfully requests
that the defendant FNU LNU, also known as "Marisol Serrano
Ruiz," be dealt with according to law.



Anthony MOPICA
Special Agent
United States Department of
State

Sworn to before me this
4th day of March, 2011



JOAN M. AZRACK
United States Magistrate Judge
Eastern District of New York